

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ECF Case

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ADRIAN HUFF, as Chairman of the Board of
Trustees of TEAMSTERS LOCAL 445 FREIGHT
DIVISION PENSION FUND,

Plaintiff,

Civil Action No. 07 Civ. 5926
(CLB)(MDF)

- against -

MID-HUDSON STEEL CORP., GRAMMAR,
DEMPSEY & HUDSON, INC., BRIDGEPORT
STEEL CO., BUELL SPECIALTY STEEL CO.,
PABRICO STEEL FABRICATORS INC., ZINC
CONSTRUCTION CORP., and AIROTRAX, INC.,

**AFFIDAVIT OF WILLIAM D.
FRUMKIN ESQ. IN REPLY TO
DEFENDANTS' OPPOSITION TO
PLAINTIFF'S MOTION FOR
SUMMARY JUDGMENT**

Defendants.

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STATE OF NEW YORK)
COUNTY OF WESTCHESTER)ss.:

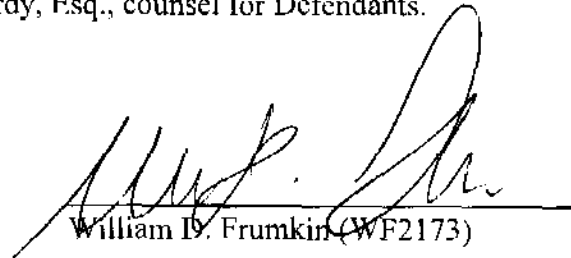
WILLIAM D. FRUMKIN, an attorney admitted to practice before this Court declares,
pursuant to 28 U.S.C. §1746, under penalties of perjury that the following is true and correct:

1. I am a partner with the law firm of Sapir & Frumkin, LLP, attorneys for Plaintiff
Adrian Huff, as Chairman of the Board of Trustees of Teamsters Local 445 Freight Division
Pension Fund. I am familiar with the facts and circumstances of this matter and submit this
Affidavit in Support of Plaintiff's Motion For Summary Judgment.

2. Annexed hereto as Exhibit "1" is a copy of correspondence, dated August 4, 2005,
from Kellie Terese Walker, Esq., to Keith McMurdy, Esq., counsel for Defendants.

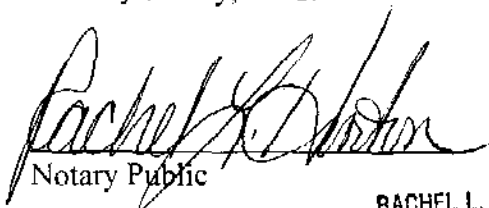
3. Annexed hereto as Exhibit "2" is a copy of correspondence, dated March 8, 2007,
from William F. Cusack, Esq., to Keith McMurdy, Esq., counsel for Defendants.

4. Annexed hereto as Exhibit "3" is a copy of correspondence, dated April 26, 2007, from William F. Cusack, Esq., to Keith McMurdy, Esq., counsel for Defendants.



William F. Frumkin (WF2173)

Sworn to before me this
22nd day of July, 2008.



Notary Public

RACHEL L. HORTON
NOTARY PUBLIC, State Of New York
No. 01H06095205
Qualified In Dutchess County
Commission Expires July 7, 20 11

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CERTIFICATE OF SERVICE

I hereby certify that on July 22, 2008, a copy of Affidavit of William D. Frumkin, Esq. in Reply to Defendants' Opposition to Plaintiff's Motion for Summary Judgment was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt including:

Keith R. McMurdy, Esq.
Fox Rothschild, LLP
100 Park Avenue, Suite 1500
New York, New York 10017

Parties may access this filing through the Court's electronic filing system

/s/ Rachel L. Horton
Rachel L. Horton